

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., *et al.*,  
  
Debtors.

Chapter 11

Case No. 24-12480 (LSS)

(Jointly Administered)

**Hearing Date: April 3, 2025 at 10:00 a.m. (ET)**

**Objections Due: March 21, 2025 at 4:00 p.m. (ET)**

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that on March 7, 2025, Fifth & Alton (Edens) LLC filed the attached *Fifth & Alton (Edens) LLC's Motion (I) for the Allowance and Payment of Administrative Expense Claim; (II) to Compel Tenant Debtor to Provide Adequate Assurance of Future Performance Under the Lease; (III) to Compel the Cure Of Nonmonetary Defaults Under the Lease; and (IV) to Establish an April 4, 2025 Deadline for the Debtors to Assume or Reject the Lease* ("Motion") with the United States Bankruptcy Court for the District of Delaware (the "Court")..

**PLEASE TAKE FURTHER NOTICE** that, any response or objection to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **March 21, 2025 at 4:00 p.m. ET** (the "Objection Deadline"), must also serve a copy of your response or objection upon the undersigned counsel so as to be received on or prior to the Objection Deadline.

**PLEASE TAKE FURTHER NOTICE** that if an objection is properly filed and served, a hearing will be held before the Honorable Laurie Selber Silverstein, United States Bankruptcy Judge, in the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 6<sup>th</sup> Floor, Courtroom #2, Wilmington, Delaware 19801 on **April 3, 2025 at 10:00 a.m. ET.**

**PLEASE TAKE FURTHER NOTICE, THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE REQUEST WITHOUT FURTHER NOTICE OR HEARING.**

Dated: March 7, 2025

**COOCH AND TAYLOR, P.A.**

/s/ R. Grant Dick IV  
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